

SHAW KELLER LLP

Emily DiBenedetto
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0713
edibenedetto@shawkeller.com

September 19, 2022

BY CM/ECF

The Honorable Colm F. Connolly
United States District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *Xhail USA, Inc. and Xhail, Inc. v. Michael J. Kiely,*
C.A. No. 22-579-CFC

Dear Chief Judge Connolly:

Pursuant to the Court’s September 15, 2022 Oral Order, plaintiffs served copies of the Court’s Order (D.I. 10) on defendant’s last known addresses in both Ireland and Los Angeles via FedEx. *See* D.I. 12. Proof of these deliveries is shown at Exhibit A and Exhibit B respectively.

Additionally, Christian Lindhé was served a copy of the Court’s Order (D.I. 10) via email. *See* D.I. 11. On June 1, 2022, Mr. Lindhé first identified himself as “representing [defendant] in relation to certain shareholder matters regarding Xhail AB[.]” Exhibit C. Thereafter on June 2, 2022, Mr. Lindhé was served with the Motion for Default Judgment (D.I. 8) but did not respond. Exhibit D. However, in response to plaintiffs’ most recent September 16, 2022 service of the Court’s Order (D.I. 10), Mr. Lindhé indicated that he doesn’t “currently represent Mr[.] Kiely, neither in this matter nor any other matter[.]” Exhibit E.

Respectfully submitted,

/s/ Emily S. DiBenedetto

Emily S. DiBenedetto (No. 6779)

cc: Clerk of the Court (by CM/ECF)